

A. SCHOOLCRAFT

1 Q. Were you aware that as a police officer, your  
2 memo book would be scratched by a supervisory officer in  
3 October of 2009?

4 MR. NORINSBERG: Objection to the form.

5 A. I am aware it was. I didn't -- I wasn't aware  
6 that it would be, no. I didn't expect it to be, either.

7 Q. Why not?

8 A. Because I was assigned to the precinct, assigned  
9 inside the precinct.

10 Q. From April 2009 until October 31, 2009, was your  
11 memo book ever scratched?

12 A. I don't believe so, no.

13 Q. Did you include notations about your  
14 conversations and meetings with I.A.B. and Q.A.D. in your  
15 memo book?

16 A. I believe they were, yes.

17 Q. Did you believe it was your duty as an N.Y.P.D.  
18 officer to document corruption and other misconduct?

19 A. Yes.

20 Q. The incident you complain of in your lawsuit  
21 occurred on October 31, 2009; is that correct?

22 A. What was the question, again?

23 Q. The incident that you complain of in your lawsuit  
24 occurred on October 31, 2009; is that correct?

25 A. Correct, one of the incidents.

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1 A. What was that again?

2 Q. Was the basis of the evidence you were presenting  
3 to I.A.B. and Q.A.D., audio recordings that you had made?

4 MR. NORINSBERG: Objection.

5 A. No, I don't believe so.

6 Q. You had no intention of providing I.A.B. or  
7 Q.A.D. the audio recordings you had made?

8 MR. NORINSBERG: Objection.

9 A. To the best of my memory, the recordings -- I  
10 wasn't -- no, not at that time, or any time. I don't  
11 recall thinking about giving the recordings to anyone.

12 Q. Did your I.A.B. Complaint, prior to October 31,  
13 2009, allege retaliation against you?

14 A. The date again, or just the whole question,  
15 please.

16 Q. Did your I.A.B. Complaint, prior to October 31,  
17 2009, allege retaliation against you?

18 A. Can you be more specific on what Complaint.

19 Q. Did you make any Complaints to I.A.B. that anyone  
20 had retaliated against you?

21 A. I believe so. Off the top of my head, what was  
22 the -- it wouldn't be -- I believe they were asking me  
23 about my 2008 evaluation appeal. But I didn't feel I had a  
24 case of retaliation yet.

25 I was -- I was waiting for the appeal to be

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1 completed. But I remember -- I believe I discussed that  
2 with some I.A.B. investigator, that the evaluation itself  
3 was retaliation for not adhering to the quota policy.

4 Q. How do you believe I.A.B. should investigate a  
5 claim of retaliation against you without informing the  
6 subject of the allegations against them?

7 MR. NORINSBERG: Objection.

8 A. Say that again.

9 Q. Well, you are claiming that you made an  
10 allegation to I.A.B. that your appeal -- I'm sorry, that  
11 your evaluation was retaliation against you; is that  
12 correct?

13 MR. NORINSBERG: Objection.

14 A. Correct, yes.

15 Q. And you wanted I.A.B. to investigate that claim?

16 MR. NORINSBERG: Objection.

17 A. I don't know if I -- I recall Internal Affairs  
18 investigators asking me about that. But I don't recall  
19 bringing that into -- I recall stating that until the  
20 appeal is done, if they have a -- I felt the supervisors  
21 may be able to explain or prove or explain themselves.

22 Q. Your Complaint alleges that the City was  
23 negligent in failing to keep I.A.B. Complaints  
24 confidential; is that correct?

25 A. I believe so. Without reviewing the document, I